

## **REMARKS**

Applicant wishes to thank the Examiner for reviewing the present application.

### **Claim Amendments**

Claims 4 and 33 have been amended for clarification purposes. In particular, it is specified that the workflow includes at least one activity from a set of activities whereby the set of activities originates from outside the application and that the activities are combined from different sources outside of the application. No new subject matter is believed to have been added by way of these amendments.

### **Claim Rejections**

Claims 4, 6-15, 18-33 and 35-51 have been rejected under 35 U.S.C. 102(e) as being anticipated by Orton et al. (U.S. Patent No. 5,717,877). Applicant respectfully traverses the rejections as follows.

Claim 4 is amended to clarify that the workflow includes at least one activity originating outside the application that are combined from different sources outside the application according to the process definition selected by the user.

Orton teaches object-oriented computer programming framework and interface for developing software applications according to object-oriented methodologies. With regards to claim 4, the Examiner relies in particular on column 5, line 25 to column 6, line 43. This passage discusses four questions that should be answered by a developer when creating an object oriented program.

The Examiner believes that the process level and process selector as recited in claim 4 is taught by the modeling that is performed by a developer to define a collection of objects for creating a suitable application. Applicant disagrees as Orton teaches only creating a set of objects within an application and does not select a process definition. At most, it creates an application according to an undefined process to at most create a way to carry out a process.

The Examiner believes that the sub-process level as recited in claim 4 is equivalent to objects within the software application that can be selected by the user as taught by Orton.

It seems (although is not clear) that the Examiner believes that the activity level as recited

in claim 4 is also equivalent to the objects in the software application as taught by Orton.

Finally, the Examiner believes that the modified data set as a result of the process steps executed according to the process definition as recited in claim 4 is equivalent to the actual manipulation of an object, e.g. to rotate an image or select text.

Based on the above, Applicant believes that the Examiner has equated the generation of an application with multiple objects as taught by Orton with the framework for monitoring "workflow" recited in claim 4.

Applicant believes that the Examiner has read too much into Orton and, in particular, has misconstrued "workflow", the process definition and in general, the nature of the activities recited in claim 4. However, as noted above, Applicant has amended claim 4 to clarify the nature of the workflow being handled by the framework recited in claim 4. In particular, claim 4 specifies that the workflow involves one or more activities from a set of activities originating from outside the application and that the activities are combined from different sources outside of the application. Orton does not teach monitoring activities within an application that originate from outside an application.

As noted above, the claimed system monitors, authors and interacts with a workflow. Orton is not concerned with workflow as recited in the claim but rather is concerned with "best practices" for creating a computer application. Clearly, if Orton teaches methodologies for creating an application he does not teach monitoring a workflow that involves activities from outside the application. Orton only teaches how to create the application itself and not monitoring workflow as recited in claim 4.

Each operation taught by Orton is performed within the yet to be completed application. At most Orton teaches building functionality into an application that allows a user to interact with an object such as a graphic. However, this is clearly not monitoring workflow according to a process definition. In fact, the "processes" described in Orton are not pre-defined steps but rather commands and objects made available to a programmer so that they can be added to the application according to best practices.

Orton simply does not monitor workflow as recited in claim 4 but only teaches of functionality within a single application where each command or function is executed and monitored within the application. There is no teaching of selecting a process definition that executes steps to modify a data set. In fact, the user must perform each step as they see fit while

the application is being constructed.

Accordingly, Applicant respectfully submits that Orton does not teach the process selector and process definitions let alone monitoring workflow as recited in claim 4. Therefore, Applicant believes that Orton does not teach every element of claim 4 and thus cannot anticipate.

Similar amendments have been made to independent claim 33 and the arguments with respect to claim 4 equally apply thereto. Claims 6-15, 18-32 and 34-51 being ultimately dependent on either claim 4 or claim 33 are also believed to distinguish over Orton.

### **Summary**

In view of the foregoing, Applicant believes that all rejections have been successfully traversed and that all pending claims, namely claims 4, 6-15, 18-33 and 35-51 are in condition for allowance.

Applicant requests early reconsideration and allowance of the present application.

Dated: July 28, 2006

Respectfully submitted,

By: /Daniel G. Nguyen/  
Daniel G. Nguyen  
Registration No.: 42,933  
JENKENS & GILCHRIST, A PROFESSIONAL  
CORPORATION  
5 Houston Center  
1401 McKinney, Suite 2600  
Houston, Texas 77010  
(713) 951-3300  
Attorneys For Applicant